

May 20, 2021

s/ Jeremy Heacock

Deputy Clerk, U.S. District Court  
Eastern District of Wisconsin

## UNITED STATES DISTRICT COURT

for the

Eastern District of Wisconsin

United States of America )  
 v. )  
 Daninelle Jones, d/o/b xx/xx/1992 ) Case No. 21-M-402 (SCD)  
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 )  
 )

Defendant(s)

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of between 2/24/21 and 5/10/21 in the county of Milwaukee in the  
Eastern District of Wisconsin, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
Title 18 U.S.C. Sections 1951(a) and 924(c) and 2	Hobbs Act Robbery and use and brandishing of a firearm during a crime of violence

This criminal complaint is based on these facts:

See attached affidavit.

Continued on the attached sheet.



Mary Davidson, FBI Special Agent

Printed name and title

Sworn via telephone; transmitted via email  
pursuant to Fed. R. Crim. 4.1

Date: 5/20/21



Stephen C. Dries, U.S. Magistrate Court Judge

Printed name and title

City and state: Milwaukee, Wisconsin

**AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT**

I, Mary Davidson, being first duly sworn, state the following is true and correct to the best of my knowledge and belief:

**I. INTRODUCTION, BACKGROUND, TRAINING, AND EXPERIENCE**

1. I am a Special Agent with the Federal Bureau of Investigation and have been so employed since May 2019. Since October 2019, I have been assigned to the Milwaukee FBI Violent Crime Task Force, a multi-jurisdictional law enforcement entity charged with investigating violations of federal law, including bank robberies, commercial robberies, armed motor vehicle robberies, and other violent crime matters, defined under Title 18 of the United States Code. I have participated in the investigation of numerous violent crimes, including armed bank robberies, armed motor vehicle robberies, and armed commercial robbery investigations in violation of Title 18, United States Code, Sections 924(c), 1951, 1956, 1957, 2113, and 2, and other related offenses. I have been trained in a variety of investigative and legal matters, including the topics of Fourth Amendment searches, the drafting of search warrant affidavits, and probable cause. I have participated in criminal investigations, surveillance, search warrants, cellular telephone extractions, interviews, DNA collection, and debriefs of arrested subjects. As a result of this training and investigative experience, I have learned how and why violent actors typically conduct various aspects of their criminal activities.

2. I have conducted and/or assisted with investigations of violent crime violations in conjunction with agents and officers from other jurisdictions, and have received training from these agents and officers in conducting these investigations. I have also conducted and/or assisted with investigations that have led to the arrest of persons for violations of law dealing with commercial robberies.

3. This affidavit is based upon my personal knowledge, training and experience, and on information reported to me by other federal, state, and local law enforcement officers during the course of their official duties, all of whom I believe to be truthful and reliable. This affidavit is also based upon my review of police reports, official records, citizen witnesses' statements, consent searches, recorded statements, law enforcement surveillance, surveillance video, social media, court records, telephone records, and public records which I consider to be reliable as set forth herein. The facts of this Affidavit are based upon information obtained from my investigation, as well as information I have received from other law enforcement officers.

4. Based on the investigation to date, I submit that there is probable cause to believe that Antonio Sampson (DOB XX/XX/1985), DeQuinn Ford (DOB XX/XX/1990), and Daninelle Jones (DOB XX/XX/1992) conspired with one another and others to commit and committed a series of armed robberies of auto parts stores in Milwaukee, Wisconsin, between February 24, 2021, and May 10, 2021, in violation of Title 18, United States Code, Sections 1951(a) (Hobbs Act robbery) and 924(c) (use and brandishing of a firearm during a crime of violence) and 2. I further submit that there is probable cause to believe that on or about May 14, 2021, DeQuinn Ford committed violations of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C) (possession with intent to distribute methamphetamine) and Title 18, United States Code, 924(c) (possession of a firearm in furtherance of drug trafficking).

5. Because this affidavit is submitted for the limited purpose of obtaining a criminal complaint and arrest warrants, I have not included each and every fact known to me concerning this investigation. I have attempted to set forth only the facts I believe are pertinent to establishing the necessary foundation for the complaint and corresponding arrest warrants.

## **II. PROBABLE CAUSE**

6. I am involved in the investigation of a series of armed robberies of auto parts stores

in Milwaukee, Wisconsin, between at least February 24, 2021, and May 10, 2021. All of the auto parts stores included in this affidavit are businesses involved in interstate commerce, and the below-described robberies affected interstate commerce.

**Armed Robbery of Advanced Auto Parts, N. Teutonia, Milwaukee – February 24, 2021**

7. On February 24, 2021, at approximately 8:58 p.m., an armed robbery occurred at the Advanced Auto Parts located at 4810 North Teutonia Avenue, Milwaukee, Wisconsin. One unidentified male subject entered the store, picked up fuses from an aisle, and went to the cash register with the fuses. The victim employee at the register began to ring up the fuses when the subject stated, “I hate to do this to another black man, but I need the money.” The subject then drew a silver handgun from his right pocket and demanded money from the register. The victim employee complied and gave the subject approximately \$1,400 in U.S. currency. The subject then fled the store.

8. The subject was described as a black male, 20-25 years old, 5'10" in height, 175 pounds, and armed with a silver handgun.

**Armed Robbery of AutoZone, N. 76<sup>th</sup> Street, Milwaukee – March 11, 2021**

9. On March 11, 2021, at approximately 6:55 p.m., an armed robbery occurred at AutoZone located at 7377 North 76<sup>th</sup> Street, Milwaukee, Wisconsin. Two unidentified male subjects entered the business and demanded and obtained money from the safe. Subject #1 asked where the safe was located and held a silver over black handgun in his right hand, pointed the gun at a victim employee’s chest, and cocked the gun. The victim employee walked the subjects to the location of the safe and observed another victim employee counting down the money. Subject #1 stated, “We want everything,” and told the victim employees that they only came for the money belonging to the store and that they were not going to take anything belonging to the employees. Subject #2 took money from the safe and placed it into a paper McDonalds bag. Subject #1 then

removed the change from the safe. Subject #1 told the victim employees, "Thank you for your cooperation," and the subjects fled from the business. The subjects obtained approximately \$2,940 in U.S. currency.

10. Subject #1 was described as a black male, approximately 28-30 years old, approximately 5'07," 140 pounds, medium build, dark skin complexion, armed with a silver over black handgun primarily in his left hand. Subject #2 was described as a black male, 30-33 years old, approximately 6'01," 175 pounds, medium build, and medium-brown skin complexion, and carrying a brown McDonald's bag.

#### **Armed Robbery of AutoZone, W. North Avenue, Milwaukee – April 1, 2021**

11. On April 1, 2021, at approximately 8:37 p.m., an armed robbery occurred at the AutoZone located at 2475 West North Avenue, Milwaukee, Wisconsin. Two subjects entered the business and demanded and obtained money from the safe. The subjects stated multiple times to the victim employees, "We are not here to hurt you, we just want the money, the money is insured." Subject #1 brandished a firearm during the robbery and pointed it at the victim employees. Subject #1 threw a black and red draw-string backpack at one of the victim employees and demanded she place the money in the bag. The victim employee complied, however, Subject #1 told her she was moving too slowly, so he took the backpack from her and took money from the safe and put it into the backpack. After obtaining the money, the subjects fled from the business. The subjects obtained approximately \$1,800 in U.S. currency.

12. Subject #1 was described as a black male, approximately 28-32 years old, approximately 5'08" in height, approximately 140 pounds, medium build, and medium-brown skin complexion, and was armed with a black revolver with a brown handle in his left hand and the gun was cocked. Subject #2 was described as a black male, approximately 28-32 years old,

approximately 5'04" in height, approximately 140 pounds, medium build, and medium-brown skin complexion.

**Armed Robbery of AutoZone, W. North Avenue, Milwaukee – April 23, 2021**

13. On April 23, 2021, at approximately 8:22 p.m., an armed robbery occurred at the AutoZone located at 2475 West North Avenue, Milwaukee, Wisconsin, which is the same location that was robbed on April 1, 2021. One unidentified subject with a gun entered the business and demanded and obtained money from the safe. The subject stated, "I need everything in the back. I don't need anything from you. Take me to the safe." One of the victim employees took the subject to the back area where the safe was located. The subject handed a black plastic bag to one of the victim employees and instructed the employee to remove the money from the safe and to place it into the plastic bag. The employee complied and emptied out the money tills into the plastic bags. After obtaining the money, the subject fled from the business. The subject obtained approximately \$909 in United States Currency.

14. The subject was described as a black male, in his 30's, 5'08"-5'10" in height, average build, dark skin complexion, and armed with a black handgun in his left hand.

**Armed Robbery of AutoZone, W. North Avenue, Milwaukee – April 30, 2021**

15. On April 30, 2021, at approximately 8:15 p.m., an armed robbery occurred at the AutoZone located at 2475 West North Avenue, Milwaukee, Wisconsin, which is the same location that was robbed on April 1, 2021, and April 23, 2021. Two unidentified subjects entered the business and demanded and obtained money from the safe. Subject #1 entered the business holding a black handgun in his left hand while Subject #2 stayed by the entrance door, acting as a lookout. Subject #1 approached the victim employees at the counter and stated, "All right come on." Subject #1 and the employees went to the rear room where the safe was located. Subject #1 had a black backpack and asked one of the victim employees to fill the backpack with cash from the safe. The

victim employee told Subject #1 he could fill the bag himself. Subject #1 filled the bag with the money from the safe, to include the coins. The subjects fled westbound out of the store. One of the victim employees observed the subjects meet up with a third subject, and all three subjects ran westbound. The subjects obtained approximately \$1,503.80 in U.S. currency.

16. Subject #1 was described as a black male, approximately 35 years old, approximately 5'08" in height, thin build, and armed with a black semi-automatic handgun in his left hand. Subject #2 was described as a black, male, in his 40's, approximately 5'08"-5'10" in height, approximately 180 pounds, medium build, and bald, wearing blue pants.

#### **Armed Robbery of AutoZone, N. 76<sup>th</sup> Street, Milwaukee – May 6, 2021**

17. On May 6, 2021, at approximately 8:48 p.m., an armed robbery occurred at the AutoZone located at 7377 North 76<sup>th</sup> Street, Milwaukee, Wisconsin. One unidentified subject entered the business and demanded money from the cash register and safe. The subject had an all-black handgun in his left hand, approached the victim employees standing at the cash register, pointed the gun at them, and demanded money from the cash register. The subject then stated, "Let's go to safe." One of the employees took the subject to the back room where the safe was located, however, no money was obtained from the safe because it was on a time lock. The subject then went back to the cash register and obtained approximately \$579 in U.S. currency from the cash register and fled from the store.

18. The subject was described as a black male, approximately 25-30 years old, 5'08" to 5'10" in height, 150-160 pounds, medium build, short "nappy" hair, medium to dark complexion, wearing a blue facemask, black hooded sweatshirt, blue oversized jeans, black backpack, and armed with a large, black handgun.

## **Armed Robbery of Advanced Auto Parts, W. National Avenue, Milwaukee – May 10, 2021**

19. On May 10, 2021, at approximately 8:36 p.m., an armed robbery occurred at the Advanced Auto Parts located at 1920 West National Avenue, in Milwaukee, Wisconsin. Immediately upon entering the store, the subject went behind the counter and brandished a firearm. The subject instructed Employee #1 to open the cash register while pointing the firearm at Employee #1. Employee #1 responded that he was unable to. At some point the subject told the victim that he would shoot him if he didn't stop moving around. The subject then ordered another employee to open the register and safe. The subject removed money from the registers, and had the employee remove the money from the safe and put it in an Advanced Auto Parts bag. The subject fled the store on foot. The robbery was captured on surveillance footage.

20. A Milwaukee County Transit System (MCTS) bus driving down National Avenue just before the robbery had surveillance footage that captured the robbery subject exit a vehicle immediately before the robbery. The vehicle was a light brown or gold 2003 Chevy Impala (hereinafter referred to as Impala), with Wisconsin license plate ALA-5187. This vehicle is registered to Daninelle Jones (hereinafter Jones) with a registered address of 2477 W. Fond du Lac, Milwaukee, Wisconsin. The footage shows the suspect exit a right-side passenger seat of the suspect vehicle, while the vehicle is stopped at the red light on National Avenue. The suspect is wearing the exact same clothing as the robber. After exiting the suspect vehicle, the suspect crossed National Avenue and walked into the entrance doors of Advanced Auto Parts to commit the robbery. The suspect's face is visible in bus footage and is consistent with Antonio Sampson (hereinafter Sampson) (XX/XX/1985).

21. The victim employees described the suspect as a black male, 35-40 years old, 5'7" in height, 160 pounds, bald, scruffy beard, wearing a gray hoodie with black strings, dark blue

(almost black) jeans, red shoes, and armed with a black and silver firearm semi-automatic firearm held in the suspect's left hand.

22. Jones has at least one child in common with Eddie Perkins-Bradford (DOB: XX/XX/1992). Jones and Perkins-Bradford have a paternity acknowledgement case with Milwaukee County (2015FA004484). In 2019, Perkins-Bradford had multiple Milwaukee Police Department (MPD) CAD calls involving Sampson. Upon searching MPD records, Sampson was identified as a black male who was bald and in his 30s. Sampson's Wisconsin identification card lists him as a black male, height 5'09," and 165 pounds which is similar to the physical description of the robbers described by witnesses in the armed robberies.

23. The Facebook page for Sampson was identified with display name "Antonio Sampson." Sampson's profile was "friends" with Facebook display name "Otw Rob Ghee" which had multiple photographs of Sampson. Photographs of Sampson from March 2021 depicted him wearing black and white Jordan tennis shoes consistent with those worn in multiple robberies and red shoes consistent with the shoes worn in the robbery at the Advanced Auto Parts located at 1920 West National Avenue, in Milwaukee, Wisconsin.

24. The Facebook page for Jones was identified with display name "Danielletoshort Jones." In Jones' "Life Events" on her Facebook page, she is listed as in a relationship with "Dequinn Ford" since February 25, 2021. Ford's Facebook display name is "Dequinn Ford (Cash Mitch Da Demon)" with a username of cash.mitch.9.

25. On May 12, 2021, surveillance was conducted on the Impala. DeQuinn Ford (hereinafter Ford) was identified as driving the Impala during the day. During surveillance, Ford was observed entering the Citgo gas station located at 1530 W. State St, Milwaukee, WI 53233. Surveillance video was obtained from the gas station which depicts Ford inside of the gas station.

26. On May 14, 2021, MPD responded to the address 2477 W. Fond du Lac, Milwaukee, Wisconsin for a child neglect call. While MPD was at the residence, DeQuinn Ford arrived at the residence. Ford was arrested by MPD for the child neglect. During the search incident to arrest, a silver over black semi-automatic handgun was located on Ford. Shortly after Ford's arrest, Jones also arrived at the residence while MPD was still on scene. Jones and Ford share the residence at 2477 W. Fond du Lac, Milwaukee, Wisconsin. Jones provided consent to search the residence and Impala. The following are some of the items recovered from the residence and Impala:

- a. Silver over black SCCY Industries CPX-2 9mm Luger semi-automatic handgun, SN: C074963 located on Ford;
- b. One black colored box, with SCCY firearms label, SN: C027683 located in residence;
- c. Two (2) black and brown leather holsters located in residence;
- d. 14 unfired cartridges, 9mm luger, recovered from Impala;
- e. Two (2) unfired cartridges, 9mm luger, recovered from residence;
- f. Six (6) unfired cartridges, 9mm luger, recovered from loaded compact size magazine in residence;
- g. 32 unfired cartridges, 9mm luger, recovered from loaded extended magazine recovered from residence;
- h. 15 unfired cartridges, 9mm luger, recovered from loaded semi-automatic handgun (SN: ;
  - i. 28 unfired cartridges, 9mm luger, located in ammunition box in residence;
  - j. One (1) ProMag brand, 9mm luger magazine recovered from Impala;
  - k. Two (3) SCCY brand, 9mm luger magazine recovered from residence;

1. One (1) ProMag brand, 9mm luger magazine recovered from residence;
- m. 17 whole, 1 half, and 1 quarter multi-colored, multi-shaped pills weighing 3.91 grams and testing positive for methamphetamines recovered from Impala;
- n. 61 whole, 1 half, and 3 quarter multi-colored, multi-shaped pills weighing 24.63 grams and testing positive for methamphetamines recovered from residence;
- o. Black digital scale with unknown white residence on metal weight plate recovered from residence;
- p. Black Adidas drawstring bag recovered from Impala.

27. During a custodial interview with Ford, Ford admitted to driving the Impala to the Advanced Auto parts store located at 1920 W. National Avenue, Milwaukee, Wisconsin on May 10, 2021. Ford stated that Sampson, whom he referred to as "Tone," wanted to rob a store and that Sampson picked that store to rob. Sampson told him that he had already robbed several auto parts stores, and he did not want to keep going to the same store because it was "hot." Ford positively identified Sampson in a booking photograph as the individual who committed the robbery on May 10, 2021. After the robbery, Ford stated that Sampson gave him and Jones approximately \$300 for driving him to do the robbery. Ford stated that gun used by Sampson in the robbery belonged to Jones. When asked about the firearm found on Ford during his arrest on May 14, 2021, Ford stated that was not the firearm used during the May 10, 2021 robbery. He stated that he and Jones both purchased guns sometime between January to March 2021, and the gun used by Sampson during the robbery on May 10, 2021 was Jones'. Further, Ford stated that he was not involved in any other robberies with Sampson. Regarding the narcotics found at the 2477 W. Fond du Lac, Milwaukee, Wisconsin residence, Ford stated that he takes the pills, and also sells the pills when Jones needs money. He stated that he does not sell all the time.

28. During a custodial interview with Jones, Jones stated that she and Ford purchased two guns together earlier in 2021. Both of the firearms purchased were silver over black 9mm handguns. Jones stated they purchased the guns for protection due to the area they lived in. Jones also stated that Ford normally drives the Impala because he has a license, and she does not have a license. Jones stated that no other males drive her Impala. When shown a surveillance still from the Citgo gas station located at 1530 W State St, Milwaukee, WI 53233, Jones positively identified Ford in the photograph. Jones stated that on May 10, 2021, she did not go to work and stayed at home all day. Upon further questioning, Jones admitted to leaving the residence and being in the front seat of the Impala during the armed robbery on May 10, 2021. Jones positively identified her vehicle and Sampson in a surveillance still from the MCTS bus video from May 10, 2021. Further, Jones stated that Ford was driving the Impala and Jones was seated in the front passenger seat. Jones stated that Sampson came over to her residence located at 2477 W. Fond du Lac, Milwaukee, Wisconsin, and told her and Ford that he wanted to rob a store. Sampson told her that he had been doing robberies for the past five days, and that he robbed the auto store by her house five different times. Jones stated before they left her house, she gave Sampson her silver over black 9mm semi-automatic handgun to do the robbery. She stated that Sampson never gave the gun back to her, and she thinks he still has it. After the robbery, she, Ford, and Jones went back to her residence, and Sampson was picked up by someone and left. Jones received some money from Sampson in exchange for her help in the robbery, but she was unsure how much. Jones stated that this was the only offense she was involved with, and she did not commit any other armed robbery offenses with Sampson. Regarding the narcotics recovered at the 2477 W. Fond du Lac, Milwaukee, Wisconsin residence, Jones stated that Ford sells ecstasy out of her house. She stated that Ford sometimes will give her money for the sale of the drugs, but he does not constantly sell drugs.

29. On May 17, 2021, Sampson was located during surveillance at the address of 3608 N. 9<sup>th</sup> Street, Milwaukee, Wisconsin. Following him being observed, MPD responded to the residence and physically located and arrested Sampson in the residence. MPD obtained a search warrant for the lower unit of 3608 N. 9<sup>th</sup> Street, Milwaukee, Wisconsin and located the following items:

- a. Black and white shoes consistent with those worn in several of the robberies;
- b. Red shoes consistent with those worn during the May 10, 2021 armed robbery;
- c. Gray sweatshirt with black strings consistent with that worn during the May 10, 2021 armed robbery.

30. During a custodial interview with Sampson, Sampson admitted to committing the armed robberies at AutoZone located W. North Avenue, Milwaukee on April 23, 2021; AutoZone located W. North Avenue, Milwaukee on April 30, 2021; and Advanced Auto Parts at W. National Avenue, Milwaukee on May 10, 2021. Sampson denied involvement with the other robberies. Sampson identified DeQuinn Ford, who he knows as “Cash,” to be involved in the April 23, 2021; April 30, 2021; and May 10, 2021 armed robberies. Additionally, Sampson stated that Ford told him that he has committed several armed robberies of AutoZones in Illinois and Milwaukee in the last couple of months. Sampson stated it was Ford’s idea to rob the auto-parts stores. Sampson said that Ford told him what to do and the things to say when he went into the stores.

31. Sampson stated that for the April 23, 2021 robbery, Ford drove him near a school located at 27<sup>th</sup> and North Avenue. Ford stayed in the vehicle, and Sampson went into the AutoZone located at 25<sup>th</sup> Street and North Avenue and committed the armed robbery. Sampson stated he was armed with a real, all-black firearm that he bought from his cousin. Sampson stated that for the April 30, 2021 robbery, Sampson, Ford, and “Dre” committed the robbery. Ford was the driver, and he and Dre went into the AutoZone. Sampson was armed with the same firearm he bought

from his cousin. Sampson did not know Dre's real name, but is someone he knows from Milwaukee. While Sampson was on his way to the 2477 W. Fond du Lac address to meet Ford to do the robbery, Sampson ran into Dre. Sampson told him about the planned robbery, and Dre wanted to come with them to make some money.

32. Regarding the May 10, 2021 robbery, Sampson stated that Ford drove him and Jones to the Advanced Auto Parts in the Impala. Jones gave Sampson her silver over black firearm to use in the robbery. Sampson was in the backseat of the Impala, got out of the vehicle, crossed the street, and committed the robbery. Ford and Jones parked around the corner. Sampson fled back to the Impala following the robbery, and the three of them drove back to the 2477 W. Fond du Lac residence. Sampson stated the firearms were loaded during the robberies, however, he never fired the firearms.

### **III. CONCLUSION**

33. Based on the investigation to date, I submit there is probable cause to believe that Antonio Sampson, DeQuinn Ford, and Daninelle Jones conspired with one another and others to commit and committed a series of armed robberies of auto parts stores in Milwaukee, Wisconsin, between February 24, 2021, and May 10, 2021, in violation of Title 18, United States Code, Sections 1951(a) (Hobbs Act robbery) and 924(c) (use and brandishing of a firearm during a crime of violence) and 2. I further submit that there is probable cause to believe that on or about May 14, 2021, DeQuinn Ford committed violations of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C) (possession with intent to distribute methamphetamine) and Title 18, United States Code, 924(c) (possession of a firearm in furtherance of drug trafficking).